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Attorneys for Plaintiff JACOB GREGOIRE

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

JACOB GREGOIRE,

Plaintiff,

v.

CALIFORNIA HIGHWAY PATROL,
an agency of the State of California;
SERGIO FLORES, and DOES 1 to 20,

Defendants.

CASE NO. 14-cv-1749-GPC (DHB)

Plaintiff's Pretrial Disclosures

Plaintiff, JACOB GREGOIRE, hereby makes the following disclosures as
required by Federal Rule of Civil Procedure 26(a)(3):

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I. WITNESSES

Witnesses the Plaintiff may call at trial are listed herein. In addition to the following, Plaintiff incorporates any witnesses identified in Defendant's disclosures and reserves the right to call such witnesses.

A. WITNESSES PLAINTIFF EXPECTS TO CALL

1. Plaintiff Jacob Gregoire – Chula Vista Fire Department, Fire Station #2, 80 East "J" St., Chula Vista, CA 91910
2. Captain David Lee Albright – Chula Vista Fire Department, Fire Station #2, 80 East "J" St., Chula Vista, CA 91910
3. Officer Sergio Flores
4. Officer Nicole Pacheco
5. Officer Eliazar Colunga
6. Lt. Karen Mentink
7. Sergeant B. Hagerty- # 11562-
8. Autumn Mitchell 1432 Owen Drive, Chula Vista, CA 91911
9. Joshua Rees – 3522 Inez Lane, San Diego, CA 92106
10. Justin Hutton – 24914 Newgarden St. Moreno Valley, CA 92551
11. Roger Clark, Police Procedures Consultant, Inc. 10207 Molina Road, Santee, CA 92071 208-351-2458
12. Neil Alex, MD, 4647 Zion Ave. San Diego, CA. 92120 (619) 528-5000
13. Dr. Breffni Barrett, PhD. 3235 4th Ave, San Diego, CA 92103

B. WITNESSES PLAINTIFFS MAY CALL IF THE NEED ARISES

1. Jesse Conner, City of San Diego Fire Captain E6
2. Darrell Roberts, Chula Vista Battalion Fire Chief
3. John McClintock, Chula Vista Fire Captain E54
4. Andrew Matthews, Chula Vista Firefighter E54

- 1 5. Jonas Jusay, Chula Vista Fire Engineer E54
- 2 6. Sergio Mora, National City Fire Department Battalion Chief
- 3 7. Sean Lowery, Chula Vista Fire Department Captain,
- 4 8. Andy Wilson, Chula Vista Fire Department Fire Engineer
- 5 9. Karen Kelly, Photographer, KFMB

6 C. DEPOSITION DESIGNATIONS

- 7 1. Plaintiffs do not expect to designate or present any witness testimony by
- 8 deposition.

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10 **II. EXHIBITS**

11 Exhibits Plaintiff may offer at trial are listed herein. In addition to the

12 following, Plaintiff incorporates any exhibits identified in Defendant's disclosures

13 and reserves the right to offer such exhibits.

14 A. EXHIBITS PLAINTIFFS EXPECT TO OFFER

- 15 1. Sergio Flores' hand drawn diagram of incident scene attached as Exhibit
- 16 10 to Vol. II
- 17 2. Traffic Collision Report
- 18 3. Incident Arrest Report
- 19 4. Defendants' Response to Plaintiff's Demand for Production of
- 20 Documents and Things to Defendant California Highway Patrol and
- 21 Sergio Flores including sealed documents of citizen complaints
- 22 5. Confidential Censure report dated 4-24-14 re: Sergio Flores
- 23 6. MVARs video dated 2-4-14
- 24 7. Audio Recordings and reports of interviews by Internal Affairs with
- 25 Sergio Flores & Nicole Pacheco
- 26 8. Verdict Form indicating Flores was found liable for excessive force dated
- 27 2-6-03
- 28 9. Video and audio of arrest

10. Audio recordings of Fire and Police Dispatch

B. EXHIBITS PLAINTIFFS MAY OFFER IF THE NEED ARISES

1. Deposition and Exhibits of Jacob Gregoire

2. Deposition and Exhibits of Sergio Flores – Volume I and II

3. Deposition and Exhibits of David Albright

4. Deposition and Exhibits of Nicole Pacheco

5. Deposition and Exhibits of Eliazar Colunga

6. Written statement of Jake Gregoire dated February 5, 2014 - 3 pages

7. Email from Jesse Conner dated February 5, 2014 - 1 page

8. Written statement of Chief Darrell Roberts titled “CHP/CHV Incident”
dated February 4, 2014 -1 page

9. FDID Report of Captain Albright dated February 5, 2014 - 2 pages

10. Email from Joshua Rees dated February 5, 2014 – 1 page

11. Email from Sergio Mora dated February 24, 2014 - 1 page

12. Email from Sean Lowery dated February 24, 2014 - 1 page

13. Email and memo from Andy Wilson dated December 18, 2010 - 3 pages

14. Email, memo and report from Sean Lowery dated December 16, 2010 –
13 pages

15. Prior citizens’ complaints against Defendant Flores

16. Pleadings and filed documents in San Diego Superior Court Case No.
GIC750293

17. Plaintiff’s Administrative Claim Form

18. California Highway Patrol/Chula Vista Fire Department joint statement

1 DATED: February 5, 2016

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